

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

Tivis Fields v. Mylan Lab. Ltd., et al.

Case No. 1:20-cv-00683-RBK-JS

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MDL NO. 2875

HON. ROBERT B. KUGLER

NOTICE OF VIDEOTAPED DEPOSITION OF WARIS A. WARIS, M.D.

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc., will take the deposition upon oral examination of Waris A. Waris, M.D., on **October 22, 2021 at 10:00 a.m. EDT** via remote deposition while the witness is at his home or office or other location agreed to by the parties. Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should contact Golkow Technologies at scheduling@golkow.com to arrange for login credentials to be sent to them prior to the deposition. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The court reporter and videographer will be an employee or agent of Golkow Technologies.

The attorney contact for the deposition is:

Gregory D. Herrold
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October 8, 2021

Respectfully submitted,

/s/ Gregory D. Herrold
Gregory D. Herrold

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*Attorney for Zhejiang Huahai
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U.S., LLC, and Princeton Pharmaceutical
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of October, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Waris A. Waris, M.D. to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants:

Sejal Brahmbhatt (counsel for Plaintiff Fields)

Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)

Daniel A. Nigh, Esq. (via email)

Ruben Honik, Esq. (via email)

David Stanoch, Esq. (via email)

Conlee Whiteley, Esq. (via email)

Seth A. Goldberg, Esq. (via email)

Jessica Priselac, Esq. (via email)

Clem C. Trischler, Esq. (via email)

Sarah E. Johnston, Esq. (via email)

//s/ Gregory D. Herrold

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